

**EXHIBIT B**

**JOINT ADMINISTRATION DECLARATION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

----- §  
**In re:** §  
§  
**GVS TEXAS HOLDINGS I, LLC,** § **Case No. 21-31121**  
§  
**Debtor.** §  
§  
**Tax I.D. No. 81-3737458** §  
----- §

**In re:** §  
§  
**GVS PORTFOLIO I B, LLC,** § **Case No. 21-31119**  
§  
**Debtor.** §  
§  
**Tax I.D. No. 83-2577171** §  
----- §

**In re:** §  
§  
**GVS PORTFOLIO I, LLC,** § **Case No. 21-31120**  
§  
**Debtor.** §  
§  
**Tax I.D. No. 83-2246441** §  
----- §

**In re:** §  
§  
**WC MISSISSIPPI STORAGE** § **Case No. 21-31125**  
**PORTFOLIO I, LLC,** §  
§  
**Debtor.** §  
§  
**Tax I.D. No. 47-4670423** §  
----- §

**In re:** §  
§  
**GVS NEVADA HOLDINGS I, LLC,** § **Case No. 21-31126**

**Debtor.**  
**Tax I.D. No. 32-0504849**  
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**In re:**

**GVS OHIO HOLDINGS I, LLC**

**Case No. 21-31123**

**Debtor.**  
**Tax I.D. No. 81-3746449**  
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**In re:**

**GVS MISSOURI HOLDINGS I, LLC,**

**Case No. 21-31127**

**Debtor.**  
**Tax I.D. No. 81-3785452**  
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**In re:**

**GVS NEW YORK HOLDINGS I, LLC**

**Case No. 21-31128**

**Debtor.**  
**Tax I.D. No. 36-4845858**  
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**In re:**

**GVS INDIANA HOLDINGS I, LLC**

**Case No. 21-31129**

**Debtor.**  
**Tax I.D. No. 81-3763929**  
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**In re:**

**GVS TENNESSEE HOLDINGS I, LLC,**

**Case No. 21-31131**

<b>Debtor.</b>	§	
	§	
<b>Tax I.D. No. 37-1835909</b>	§	
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<b>In re:</b>	§	
	§	
<b>GVS TEXAS HOLDINGS II, LLC</b>	§	<b>Case No. 21-31122</b>
<b>LLC,</b>	§	
	§	
<b>Debtor.</b>	§	
	§	
<b>Tax I.D. No. 30-0951225</b>	§	
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	§	
<b>GVS OHIO HOLDINGS II, LLC</b>	§	<b>Case No. 21-31124</b>
<b>GP LLC,</b>	§	
	§	
<b>Debtor.</b>	§	
	§	
<b>Tax I.D. No. 82-1662376</b>	§	
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<b>In re:</b>	§	
	§	
<b>GVS ILLINOIS HOLDINGS I, LLC,</b>	§	<b>Case No. 21-31130</b>
	§	
<b>Debtor.</b>	§	
	§	
<b>Tax I.D. No. 82-1669944</b>	§	
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<b>In re:</b>	§	
	§	
<b>GVS COLORADO HOLDINGS I, LLC</b>	§	<b>Case No. 21-31132</b>
	§	
	§	
<b>Debtor.</b>	§	
	§	
<b>Tax I.D. No. 82-1320408</b>	§	
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**DECLARATION OF ROBERT D. ALBERGOTTI IN SUPPORT OF THE  
EMERGENCY MOTION OF DEBTORS PURSUANT TO BANKRUPTCY  
RULE 1015(b) AND LOCAL RULE 1015-1 FOR ORDER DIRECTING  
JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Robert D. Albergotti, being duly sworn, states the following under penalty of perjury:

1. I am an independent director on the board of directors (the “Board”) of GVS Texas Holdings I, LLC (“GVS Texas”) and its affiliated debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”). I have over forty years of experience in the development and implementation of complex restructuring solutions through internal reorganizations, asset dispositions, divisional shutdowns, and Chapter 11 restructurings. I am generally familiar with the Debtors’ day-to-day operations, business and financial affairs, and books and records.

2. To minimize the adverse effects of filing the chapter 11 petitions while at the same time preserving value for the benefit of stakeholders, the Debtors have filed a number of motions requesting various kinds of “first day” relief, including the *Motion of the Debtors Pursuant to Rule 1015(b) and Local Rule 1015-1 for Order Directing Joint Administration of Chapter 11 Cases* (the “Motion”).<sup>1</sup> I submit this declaration (this “Declaration”) in support of the Motion, which seeks entry of an order directing joint administration of these chapter 11 cases for procedural purposes.

3. Except as otherwise indicated herein, all statements set forth in this Declaration are based on (a) my personal knowledge of and familiarity with the Debtors’ operations, finances, and restructuring efforts; (b) my review of relevant documents and information provided to me by employees of or advisors to the Debtors; and (c) my opinion based on my experience and knowledge concerning the Debtors’ operations and financial and business affairs, including my general knowledge of the industry in which the Debtors operate. I am over the age of 18 and authorized to submit this Declaration on behalf of the Debtors. If called upon to testify, I would testify competently to the facts set forth herein.

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<sup>1</sup> Unless otherwise defined herein, capitalized terms in this Declaration shall have the meanings ascribed to them in the Motion.

### **Background of the Debtors**

4. On the date hereof (the “Petition Date”), the Debtors filed these cases under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Texas (the “Court”) in order to preserve and maximize the value of the Debtors’ assets for the benefit of their stakeholders and the estates.

5. The Debtors are limited liability companies with the principal business of owning a wide array of properties functioning principally as self-storage and parking facilities. The properties are managed by a non-Debtor operating affiliate that maintains, manages and operates the facilities. The Debtors have approximately 64 storage locations in Texas, Colorado, Illinois, Indiana, Mississippi, Missouri, Nevada, New York, Ohio, and Tennessee. Six of the properties are in the Dallas-Fort Worth Metroplex, with an additional 28 located elsewhere in the State of Texas. Since their formation, the Debtors and their non-Debtor operating affiliates have generated revenue and marketed their services as the “Great Value Storage<sup>2</sup>,” and maintain approximately 30,811 units, totaling 4,103,764 square feet. The storage units offer secure storage with 24-hour security systems, both climate controlled and non-climate controlled, RV, car, and boat parking, moving and storage supplies and moving truck rentals. In addition to conventional storage units, the GVS Portfolio includes 1,380 covered and uncovered vehicle parking units; thirteen office, warehouse and retail commercial spaces; four campsites; seven billboards; and, two cell tower leases.

6. The Debtors own the properties, and the facilities are managed and operated by a non-Debtor affiliate responsible for the leasing, management, and operation of the storage

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<sup>2</sup> [www.greatvaluestorage.com](http://www.greatvaluestorage.com)

facilities. The Debtors generate revenue through the regular and periodic collection of rents from the thousands of tenants who lease storage space at the properties.

7. The Debtors' board consists of myself, an independent director, Natin Paul, Richard Arthur, an independent director, and Colleen De Vries, an independent director. Each of the Debtors are directly or indirectly owned by GVS Portfolio I, LLC, GVS Portfolio I B, LLC, and GVS Portfolio I C, LLC.

### **Joint Administration Motion**

8. Because the Debtors' financial affairs and business operations are closely related, many of the motions, hearings, and orders in the bankruptcy proceedings will affect all of the Debtors. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections without harming the substantive rights of any party in interest.

9. Joint administration will significantly reduce the volume of paper that otherwise would be filed with the Clerk of the Court, because it will avoid the preparation, replication, service, and filing, as applicable, of duplicative notices, applications, and orders. Accordingly, I respectfully ask the Court to grant the relief requested in the Motion.

*[Remainder of Page Intentionally Left Blank]*

I declare under penalty of perjury that, after reasonable inquiry, the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 17th day of June, 2021

/s/ Robert D. Albergotti

Robert D. Albergotti

Director

GVS Texas Holdings I, LLC